

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PA.
ERIE DIVISION

(Write the District and Division, if any, of
the court in which the complaint is filed.)

RENE' VENITA JOHNSON PRO SE

(Write the full name of each plaintiff who is filing
this complaint. If the names of all the plaintiffs
cannot fit in the space above, please write "see
attached" in the space and attach an additional
page with the full list of names.)

-against-

BUREAU
CITY OF ERIE POLICE DEPT. ERIE PA.
CITY OF ERIE MAYOR'S OFFICE

(Write the full name of each defendant who is
being sued. If the names of all the defendants
cannot fit in the space above, please write "see
attached" in the space and attach an additional
page with the full list of names.)

Complaint for a Civil Case

Case No. 1:19-CV-177

(to be filled in by the Clerk's Office)

Jury Trial: ☐ Yes ☐ No
(check one)

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	RENE' VENITA JOHNSON (PRO SE)
Street Address	160 WEST 8 th ST. Apt 9K
City and County	ERIE + ERIE
State and Zip Code	PA. 16501
Telephone Number	(814) 790-5626
E-mail Address	Rjoh1028@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	OUTLAW, MICHAEL
Job or Title (if known)	MAYOR'S ASST.
Street Address	626 STATE ST. 5 th Fl.
City and County	ERIE + ERIE
State and Zip Code	PA. 16501
Telephone Number	(814) 870-1200
E-mail Address (if known)	UNKNOWN

Defendant No. 2

Name	NOLAN, MIKE
Job or Title (if known)	CHIEF DEPUTY
Street Address	626 STATE ST.
City and County	ERIE + ERIE

State and Zip Code

PA. 16501

Telephone Number

(814) 870-1125

E-mail Address

UNKNOWN

(if known)

Defendant No. 3

Name

FURMAN, C

Job or Title

OIC (Officer in charge)

(if known)

Street Address

626 STATE ST.

City and County

ERIE + ERIE

State and Zip Code

PA. 16501

Telephone Number

(814) 870-1125

E-mail Address

UNKNOWN

(if known)

Defendant No. 4

Name

GREEN

Job or Title

BADGE # 443

(if known)

Street Address

626 STATE ST.

City and County

ERIE + ERIE

State and Zip Code

PA. 16501

Telephone Number

(814) 870-1125

E-mail Address

UNKNOWN

(if known)

SEE ATTACHMENT

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

RENE' VENITA JOHNSON (PRO SE)

ATTACHMENT:

1. THE PARTIES TO THIS COMPLAINT

B. THE DEFENDANT (S)

DEFENDANT NO. 5

WIERBINSKI, ROB

(M2) OFFICER

626 STATE ST.

ERIE & ERIE

PA. 16501

(814) 870-1125

EMAIL --UNKNOWN

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Section 1983 of Civil Rights Act 1871
FED. R. CIV. P. 12(A)(2) OR (3) RULE 12(b) 6

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) _____, is a citizen of the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____ and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is
incorporated under the laws of the State of (name) _____
_____, and has its principal place of
business in the State of (name) _____. Or is
incorporated under the laws of (foreign nation)
_____, and has its principal place of
business in (name) _____.

*(If more than one defendant is named in the complaint, attach an
additional page providing the same information for each additional
defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant
owes or the amount at stake—is more than \$75,000, not counting interest
and costs of court, because (explain):

DEMAND REQUEST of \$5,000,000.00

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as
briefly as possible the facts showing that each plaintiff is entitled to the damages or other
relief sought. State how each defendant was involved and what each defendant did that
caused the plaintiff harm or violated the plaintiff's rights, including the dates and places
of that involvement or conduct. If more than one claim is asserted, number each claim
and write a short and plain statement of each claim in a separate paragraph. Attach
additional pages if needed.

SEE ATTACH

RENE' VENITA JOHNSON (PRO SE)

ATTACHMENT:

3. STATEMENT OF CLAIM

I AM CLAIMING CITY OF ERIE DID NOTHING TO PROTECT AND SERVE

IT IS NOT COMPREHENDIBLE THAT A LAW ENFORCEMENT AGENCY WOULD DISREGARD THE APPROPRIATE ACTION NECESSARY WHEN RESPONDING TO A PHYSICAL HARASSMENT DISTURBANCE

- DEFENDANT NO. 4: GREEN, BADGE #443, ALLOWED MY ASSAILANT TO GO SLEEP OFF HIS DRUNKENNESS AFTER HE BEAT ME. GREEN WALKED AWAY FROM A FELONY WITHOUT FILING A REPORT OR FOLLOWING PROPER PROTOCOL. GREEN WAS SEXIST AND RACIST IN HIS ACTIONS AND DECISIONS TO WHICH RESULTED TO ME NOT BEING ABLE TO RECEIVE CRISIS SERVICES.
- DEFENDANT NO. 3: FURHMAN, C., WAS THE OFFICER IN CHARGE (OIC) THE DAY OF THE INCIDENT. (JUNE 2, 2018). THIS OIC WAS INFORMED BY MY FAMILY MEMBER OF THIS OFFICERS' MISCONDUCT AND DID NOTHING TO PREVENT THIS SITUATION FROM ESCALATING.
- DEFENDANT NO. 2 NOLAN, M., I WAS GIVEN A BOGUS INCIDENT REPORT THAT KEPT ME FROM SERVICES REINDERED FOR ASSISTANCE.

SITUATION FOUND: HARASSMENT

CIRCUMSTANCES: ARGUMENT

DEFENDANT NO. 5: WIERBINSKI, R., BADGE #313, THIS OFFICER WROTE THE BOGUS REPORT THAT ALSO REINDERED ME FROM RECEIVING ANY CRISIS SERVICES. THIS OFFICER ATTENDED A HEARING AND DID NOT ASSIST MY SITUATION W/REPORT AFTER THE VERDICT.

DEFENDANT NO. 1: OUTLAW, M., IN MEETING W/MAYOR'S ASSISTANCE, AND W/FAMILY AND I, REMARKS WERE MADE TO ME FROM OUTLAW REGARDING MY ASSAILANTS' AGE.

RENE' V. JOHNSON

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

SEE ATTACH

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 6/28/, 2019

Signature of Plaintiff

Printed Name of Plaintiff

Rene Venita Johnson PRO SE
RENE' VENITA JOHNSON PRO SE

B. For Attorneys

Date of signing: _____, 20__.

ATTACHMENT:

5. RELIEF

I AM SEEKING DAMAGES FOR THE MENTAL ANGUISH I SUFFERED ON JUNE 2, 2018, UP TIL CURRENT DATE, DUE TO THE DESPICABLE ACTIONS OF THE ERIE POLICE DEPT.

THIS BEAT DOWN WAS VERY MUCH TRAUMATIZING AND UNEXPECTED IN THE NON-PROFIT SENIOR LIVING COMMUNITY OF METHODIST TOWERS.

AN APPROVED TENANT IN THIS COMMUNITY DID INTENTIONAL ENTER MY APARTMENT W/OUT CONSENT, FORCEFULLY, VIOLENTLY AND AGGRESSIVELY, CAUSING ME NOT ONLY PHYSICAL HARM, BUT| CREATING A SERIOUS TRAUMATIC CONDITION, ENABLING ME FROM BEING ABLE TO LEAVE MY APARTMENT. NO ACTIONS WAS TAKEN BY EPD TO APPREHEND THE ASSAILANT AT THAT TIME.

TO ADD INSULT TO INJURY; MAYOR'S REPRESENTATIVE, M. OUTLAW SCHEDULE A MEETING ON JUNE 18, 2018, TO DISCUSS THE INCIDENT W/FAMILY AND I. AS MTG CONTINUED, OUTLAW BOUGHT UP THE AGE OF MY ATTACKER AND HOW I SHOULD UNDERSTAND THE MAN IS OVER 70. I FELT HARASSED BY OUTLAW CONTINUING TO CALL MY HOME W/NOTHING TO SAY BUT, "WHAT'S YOUR NEXT MOVE?"

EPD DID NOTHING TO HELP MY SITUATION, ONLY TO MAKE IT WORST THAN WHAT I HAD ALREADY EXPERIENCED FROM MY ATTACKER.

Signature of Attorney

Rene Johnson PRO SE

Printed Name of Attorney

Rene V Johnson

Bar Number

Name of Law Firm

Address

160 W 8th St. 9K

Telephone Number

814 7905626

E-mail Address

RJD11028@gmail.com

Certificate of Service

I hereby certify that a true copy of the foregoing Consent was served (by mail) (by hand delivery) (v/a electronically) on all parties of record in this cause, this 6/28/19 day of _____, 20__.

Bene Veneta Johnson PRO SE
Signature